



Brockton, Massachusetts

ROI-19-A-011

"City of Champions"

Bill Carpenter – Mayor

Narrative Information Sheet

1. Applicant Identification: City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301.
2. Funding Requested:
 - a. Assessment Grant Type: Community-Wide
 - b. Federal Funds Requested
 - i. \$300,000
 - c. Contamination: Hazardous Substances and Petroleum
3. Location: Brockton, Plymouth County, Massachusetts
4. Property Information for Site-Specific Proposals: Not Applicable
5. Contacts:
 - a. Project Director: Rob May, Director of Planning and Economic Development, City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301. Mr. May can be reached via telephone at (508) 580-7113 or email rmay@cobma.us.
 - b. Chief Executive/Highest Ranking Elected Official: The responsible Chief Executive is Mr. Bill Carpenter, Mayor, City of Brockton, Brockton City Hall, 45 School Street, Brockton, MA 02301. Mr. Carpenter may be reached at (508) 580-7123 or email billcarpenter@cobma.us.
6. Population: 94,017
7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	2
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	3, 4
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

8. LETTER FROM State Environmental Agency: Attached



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

January 3, 2019

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT
City of Brockton, Brownfield Assessment Grant

Dear Mr. Gardner:

I am writing to support the proposal submitted by the City of Brockton (City) under the Fiscal Year 2019 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. Funding from EPA will further support the City's efforts to facilitate the redevelopment of contaminated sites throughout the Downtown Target Area.

On January 23, 2015, Governor Baker signed his first Executive Order, creating the Community Compact Cabinet, in order to elevate the Administration's partnerships with cities and towns across the Commonwealth. Lieutenant Governor Polito chairs the cabinet, which concentrates financial, technical, and other resources at the state level to a select group of projects including Brownfields. The City's compact was signed on October 28, 2015, ensuring any funding provided by EPA will be supported by a focused commitment of state resources.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Paul Locke
Assistant Commissioner, Bureau of Waste Site Cleanup

ec: Mayor Bill Carpenter, City of Brockton
Tracey Costa, LSP, Ransom Environmental
John Handrahan, Brownfield Coordinator, MassDEP Southeast Regional Office

This information is available in alternate format. Call the MassDEP Diversity Office at 617-556-1139. TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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Downtown Target Area

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (30 Points)

1. a. Target Area and Brownfields (15 points)

1.a.i. Background and Description of Target Area (5 points)

Brockton is a proud, hard-working, diverse, and struggling city located in Plymouth County in southeastern Massachusetts, and is the seventh-largest city in the state, with 94,017 residents¹, located 25 miles south of Boston. The lifeblood of Brockton is the Downtown target area, which historically served as the industrial center for over 50 shoe and textile factories and set on the banks of the Salisbury Plain River, which once powered the factories. Our heydays in the 19th and 20th centuries as the “Shoe City” dwindled and left behind a legacy of contamination, job loss, crime and environmental justice (EJ) concerns over the last 50 years. We are a state-designated **Economic Target Area (ETA)** and an **Economically Distressed Area (EDA)**, due to job loss and business closures, and a state-designated “**Gateway City**”, which offered good jobs and “gateway” to the American Dream, but now suffers from the loss of manufacturing jobs over several decades. The target area encompasses 2 of the 4 tracts in the City designated as a federal **Opportunity-Zones**², to drive tax-advantaged private investment. The target area is located within the **Downtown Brockton Improvement District** and the City provides **District Improvement Financing (DIF)** and **Tax Increment Financing (TIF) Programs**³ for redevelopment. The densely-populated target area is a mix of shuttered storefronts, dilapidated low-income multifamily housing, schools, churches, vacant lots and underutilized parking lots. In 2017, Brockton was listed as **one of the 100 most dangerous cities in the country**⁴, characterized by gang warfare, drive-by shootings, and drug overdoses, prevalent in the target area. An underinsured population **exceeding 70% minority**⁵ suffers from EJ concerns, high incidence of disease, poverty, low education rates, and language barriers. These challenges are exacerbated by food insecurity, lack of recreational opportunities and lack of jobs. The target area is amongst the 84 **EJ Block Groups**⁶ in the City. The student population is ethnically, racially, culturally and linguistically diverse, with 30 different languages represented⁷.

1.a. i.i. Description of the Priority Brownfields Sites (10 points)

The target area is hampered by over 75% of the 581 state-listed contaminated sites in the city, including over 100 Brownfields sites in the target area that contribute to blight, disease, and devastating morale. The target area includes a history *prevalent in boot & shoe factories* and industrial use, intermingled with schools, churches, and commercial and residential use. There is a likelihood that *flooding from Salisbury Plain River can cause the spread of contaminants*. Wastewater discharges, and lead paint exceed the 90th percentile⁸, exacerbating contaminant exposure. Furthermore, demolished historic buildings are likely to have been buried in place (prevalent in urban areas) as fill material, with the potential of asbestos, PCBs, lead paint, coal ash, wood ash and polycyclic aromatic hydrocarbon (PAH) contamination. The City has established the following **Brownfields priority sites** within 4 interconnected blocks in the 61-acre target area which will include the *developer acquisition and reinvestment of close to 50 parcels* to accomplish our **Downtown Revitalization Plan**. Historic maps⁹ and the state waste site

¹ 2010 US Census

² The U.S Treasury designated Brockton as an Opportunity Zone in May 2018

³ District Improvement Financing (DIF) and Tax Increment Financing (TIF) are economic tools that promote redevelopment by use of public/private partnerships. TIF offers tax breaks to developers, while DIF channels tax dollars into targeted redevelopment districts.

⁴ Neighborhood Scout's Most Dangerous Cities-2018

⁵ U.S Census Tract data for 2010.

⁶ Environmental Justice Communities in Massachusetts. Massachusetts Executive Office of Energy and Environmental Affairs

⁷ Brockton Public Schools Academic Profile

⁸ EPA EJSCREEN

⁹ Sanborn Fire Insurance Maps

Downtown Target Area

cleanup database¹⁰ were utilized to evaluate former usage and suspect/known contamination.

Northeast Quadrant: Main & Montello Streets Block (17 acres): *Two priority sites* are located within the footprint of the former (fmr.) J. McCarthy Shoe Factory, JAS. Means Boot & Shoe Factory and H.T. Marshall Boot & Shoe Factory. Suspect contaminants include heavy metals, solvents, and petroleum. A *3rd priority site* is Angelo's Cleaners-A release of PCE¹¹ occurred in 2011 and the site is out of state compliance. Lead and arsenic may be present in soils from weed killer application along the easterly rail line. The block includes a *bus terminal and commuter rail station*; older vacant buildings; former and active gas stations and parking lots.

Northwest Quadrant: Main & Pleasant Streets Block (12 acres): *Two (2) priority sites* are located within the footprints of the fmr. J.O. Emerson Shoe Factory, French Boot & Shoe Factory, H.T. Marshall Boot & Shoe Factory and L.C. Bliss & Co. Shoe Factory. Suspect contaminants include heavy metals, solvents and petroleum. There are over 10 multifamily buildings and shuttered businesses, empty lots, vacant office space, parking lots and 3 churches.

Southeast Quadrant: Main & Centre Streets Block (21 acres): *Portions of this block are located within a FEMA-designated special flood hazard area.* *One priority site* is located within the footprint of Baxendale and Co. Box Toe factory. Suspect contaminants include heavy metals, solvents, PCBs, PAHs, and petroleum. Lead and arsenic may be present in soils along the easterly rail line. City Hall Plaza, Brockton Commons (affordable and elderly) housing building, 2 churches, seasonal farmer's market are located amongst shuttered and underperforming commercial businesses.

Southwest Quadrant: Main & W. Elm Streets Block (11 acres): There are abandoned old buildings with suspect hazardous building materials, along with an automotive repair center. Residents of multifamily housing and students walking to the 3 schools (*Brockton Champion High School, Champion HMCS School, BB Russell Alternative School*) and 2 churches pass vacant businesses and a low-rate hotel with a history of crime and drug activity.

1.b. Revitalization of the Target Area (9 points)

1.b.i. Redevelopment Strategy and Alignment with Revitalization Plans (5 points)

The City implemented a **Downtown Action Strategy** and prepared an **Urban Redevelopment Plan** in 2015, which built upon core elements from previous planning strategies and includes the **Enterprise Block** project in the target area, as a vibrant, mixed-use development. The 15-year revitalization is anticipated to bring more than \$80.3M in private investment to several long underutilized and vacant sites, create up to 450 jobs, and generate up to \$62.2M in DIF funds over 30 years. Construction of 631 new housing units permitted under the City's 40R Smart Growth Zoning District¹², adopted in 2007, will yield \$1.9M in 40R Density Bonus payments. The transit-oriented district (TOD) sits within walking distance of the commuter rail station in the target area. New development includes restoration of several historic buildings for retail, commercial and housing uses. The **Downtown Action Strategy** identified projects which will encourage and inspire other projects and spread revitalization success throughout the target area¹³. The City launched this planning effort as the first stage of the **Brockton Gateway Transformative Development Initiative (TDI)**, which is a partnership with the City, Brockton

¹⁰ Massachusetts Department of Environmental Protection (MassDEP) Waste Site and Reportable Releases database

¹¹ Tetrachloroethylene (PCE)

¹² The state's Smart Growth Zoning Overlay District Act, Chapter 149 of the Acts of 2004, codified as M.G.L. chapter 40R (the Act), encourages communities to create dense residential or mixed-use smart growth zoning districts, including a high percentage of affordable housing units, to be located near transit stations, in areas of concentrated development such as existing city and town centers, and in other highly suitable locations.

¹³ Meets EPA's Strategic Plan, Goal 1-Core Mission, Objective 3-Revitalize Land and Prevent Contamination

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21st Century Corporation (B21)¹⁴, and Trinity Financial, the firm redeveloping ***Enterprise Block***. MassDevelopment, the state's economic development and finance agency, chose Brockton for a TDI District¹⁵ in 2014. The TDI partnership consists of a team of residents, property and business owners, representatives of institutions, and other stakeholders. The 2015 redevelopment included the construction of Trinity's ***Enterprise Block***-a mix of 113 affordable- and market-rate apartments; rehabilitation of a historic building for office use; 42 artist live-work units, affordable to artists earning up to 60% of the Area Median Income (AMI), creating 120 jobs to date and \$500K in incremental tax revenue. Phase I of the City's revitalization includes the 2nd phase of ***Enterprise Block*** with 102 units of affordable and market rate housing. Construction of a new 414 space public parking garage will allow the City to consolidate several surface parking lots to make them available for redevelopment as part of four new parcels. There are 61 parcels identified for redevelopment in Phase I. Redevelopment will include ground floor retail, artist gallery space, green space, 55,000 square feet of new commercial and office space. *121 Main Street* will be a new 48-unit housing project designed for low income families-30 units will be held for households earning less than 60% of AMI and 18 units will be held for households earning less than 110% of AMI. The project is being sponsored by the non-profit NeighborWorks of Southern Massachusetts. The City is serving as a "matchmaker" between property owners and interested developers for Brownfields properties. Phase II of the City's revitalization targets eight properties and Phase III addresses an additional five properties.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy (4 points)

The Downtown Action Strategy was developed to promote a "Livable Downtown". In addition to increasing tax revenue, redevelopment outcomes and benefits include: *Improved residential density and increase in property values and affordable housing*; Green space to *promote recreational opportunities, improve aesthetics, well-being*; *Expansion of small businesses and attracting new small business entrepreneurs*; *Improve public safety*, with foot/bike patrols; improved lighting; launch of a Clean, Green, and Safe Ambassadors program¹⁶; *Upgrade streetscape and infrastructure*, including green stormwater infrastructure (GSI)¹⁷ to decrease flooding; *Promoting community diversity attracting entertainment and cultural organizations*-For ethnic restaurants, boutiques, and food stores to create new Downtown destinations¹⁸; *Pedestrian-oriented development (POD)*, to increase exercise/health benefits and expand TOD by connecting pedestrians with commuter rail and bus terminal; *Access to fresh food*, by expanding the Brockton Farmer's Market and walkable access to markets, including Vicente's Supermarket, located on the northern edge of the target area; *Increase of temporary and permanent job opportunities*; *Restoration of historic buildings* will reduce exposure to building materials contaminant impacts, improve aesthetics, and celebrate the City's valuable historic character; *Renewable energy* by connecting to the ***Brockton Brightfield solar array***¹⁹.

¹⁴ B21 was established in 1993 to serve as the quasi-public economic development organization "to enhance the position, image, and perception of Brockton as a desirable place to live and work by encouraging financial investment, business development, job creation and retention through economic development.

¹⁵ MassDevelopment's **Transformative Development Initiative (TDI)** is a place-based development program for Gateway Cities designed to enhance local public-private engagement and community identity; stimulate an improved quality of life for local residents; and spur increased investment and economic activity.

¹⁶ Ambassadors will create additional "eyes on the streets;" discourage inappropriate behavior; remove litter; and maintain planters and hanging flower baskets. This program offers an effective and relatively affordable way to improve dramatically the perception of Downtown safety.

¹⁷ GSI is proven, *sustainable* flood-prevention strategy

¹⁸ In May 2018, MassDevelopment and the civic crowdfunding platform [Patroncity](#) launched a new Commonwealth Places campaign with the City of Brockton and Student Ambassadors Bonded Under Recreation & Achievement (SABURA) to transform an underused Downtown vacant lot into a vibrant and lively space filled with music, events, food and festivities year-long

¹⁹ The 425-kilowatt solar array is owned by the City and is a **Brownfields to Brightfields** success, located within the target area.

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1.c. Strategy for Leveraging Resources (6 points)

1.c.i. Resources Needed for Site Reuse (4 points): As a **Massachusetts Gateway City**, Brockton has several options to leverage funding to support cleanup and redevelopment of Brownfields sites after assessment. The City is eligible to apply for up to \$100K for MassDevelopment Brownfields Assessment funding per site and up to \$500K Cleanup funding per site. The Assessment grant funding from EPA will allow the City to apply for MassDevelopment Cleanup funding, as needed, to push the sites to redevelopment. We can continue to draw from our state-funded **MassWorks 2015 Streetscape Improvements and Infrastructure Grant Program**. The project will leverage \$2M in local funds for traffic flow improvements. The City has also been allotted \$2M in **MassDOT Chapter 90 transportation funding**, which can be used to support infrastructure improvements. The City's Community Development Block Grant (**CDBG**) and Housing and Urban Development (**HUD**) funding can be allocated for low-and moderate-income households within the target area. The City plans to contribute \$450K in HUD HOME funds to the revitalization. We will also utilize District Improvement Financing (DIF) funding. The City was designated by the state as a **Green Community** in 2017 and awarded \$526K, which can be used for renewable energy and energy efficiency projects. We will work with developers to seek state Brownfields, historic and energy tax credits.

1.c.ii. Use of Existing Infrastructure (2 points): The target area is connected to public water, separate sewer and stormwater utilities, along with electric, natural gas, and communications (i.e., cable, high-speed internet, fiber optics). OpenCape, the high-speed fiber-optic network for Southeastern Massachusetts, runs directly through the target area. Most of these utilities in the target area are located underground, providing security and reducing outages during storm events. New development is anticipated to utilize and improve existing infrastructure, along with upgrading stormwater discharges by implementing GSI. New buildings may also be designed with solar panels and/or connect to the Brockton Brightfield solar array. Enhancements of Downtown infrastructure will improve walkable connections to existing amenities, including Vicente's Supermarket and link to new activity to existing assets.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (20 Points)

2. a. Community Need (12 points)

2.a.i. The Community's Need for Funding (3 Points): Since 2017, 270 teachers suffered 2 layoffs, due to a \$16M state-funded budget gap, resulting in classroom overcrowding and learning deficits-Between 80-90th percentile have less than a high school education²⁰. *New revenue will help with teacher hires and the Downtown Brockton Higher Education Collaborative²¹ to provide a seamless and supportive environment for high school completion; English for non-native speakers; educational certification; credentialing; targeted workforce-skills training.* The target area has lost over 4,000 jobs in the last 20 years. ***The per capita income in the target area is \$14,922²².*** *Redevelopment of Brownfields sites will result in new jobs and workforce training and the POD and TOD will link residents to transportation and jobs.* Renter-occupied housing is 88.7% in the target area, exceeding the state (39%) and national (31%) rates. There are over 250 residential foreclosures²³ in the target area. *Development of new*

²⁰ EPA EJSCREEN

²¹ The Collaborative has developed and committed to an economic-development strategy rooted in workforce investment and education. Led by Bridgewater State University, UMass Boston and Massasoit Community College, it also includes the City, Brockton Public Schools, Southeastern Regional Vocational Technical High School, and the Brockton Area Workforce Board.

²² Census Block Group 510900-2 in Plymouth County, Massachusetts

²³ City of Brockton foreclosures. Trulia

Downtown Target Area

affordable housing will provide opportunities for home ownership, and the revitalization effort is expected to push landlords to improve decrepit rental buildings.

2.a.ii. Threats to Sensitive Populations (9 Points)

(1) Health or Welfare (3 points): Assessment of the Brownfields sites is the catalyst for cleanup and reinvestment²⁴. Brockton is one of eight cities in the state classified by the U.S. Dept. of Agriculture (USDA) as a **food desert**²⁵, which *will be improved by access to fresh food*. In 2015, Brockton was one of 11 state communities with teen birth rates that exceeded the state average²⁶, reflecting a burden on young mothers and their babies-The state designated Brockton as 1 of 3 cities that does not provide adequate pre-natal care of teens, which is closely tied to high infant mortality²⁷. The underinsured community relies heavily on the Brockton Neighborhood Health Center and HHS Community Health Center in the Downtown, created to combat the state's designation as a "Medically Underserved Area"²⁸. Housing parcels in the target area are less than ¼ acre in size and clustered among the Brownfields sites. The elderly and children under 5 in the target area exceed the 90th percentile²⁹. Sensitive populations reside in close proximity to Brownfields sites. *The Brownfields program is anticipated to facilitate community outreach in the target area by identifying and connecting families and individuals in need with community health resources, including education and access to care. New affordable housing will replace aging, crowded, unhealthy residential buildings.* **(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (3 points):** Incidents of breast cancer, colon/rectal cancer, lung and bronchus cancer, melanoma, thyroid cancer in the community exceed state rates³⁰ and may be linked to heavy metals, chlorinated solvents, PCBs and petroleum compounds at Brownfields sites in the target area. We are the 3rd highest community in the state with the most incidents of childhood lead poisoning (likely from lead paint in old housing stock) and highest asthma prevalence³¹, which may be associated with VOC exposure. Elderly suffering includes total tooth loss close to 25% (exceeding 15% in state)³², likely attributed to lack of fluoridation in City water³³. We have higher rates of adult obesity, arthritis, high blood pressure, chronic obstructive pulmonary disease, incidence of high blood pressure, stroke, and lack of insurance than state rates³⁴, linked to lack of exercise and access to healthy food. *Assessment of Brownfields sites will identify contaminants of concern and include risk characterizations to assess potential risk to human health. These data will be shared with our community health partners. Assessed Brownfields sites will be cleaned up, mitigating contaminant exposure to sensitive populations. Our community health partners will identify individuals with health needs that will benefit from affordable housing, access to fresh and healthy food and exercise benefits from new greenspace and pedestrian-oriented development.* **(3) Economically Impoverished/Disproportionately Impacted Populations (3 points):** Linguistically-isolated individuals in the target area exceed the 90th percentile; our minority population exceeds 55%³⁵ and the most common racial or ethnic group living below the poverty line in Brockton is Black or African American,³⁶ and

²⁴ Meets EPA's Strategic Plan, Goal 1-Core Mission, Objective 3-Revitalize Land and Prevent Contamination

²⁵ IBID

²⁶ Massachusetts State Health Assessment

²⁷ The Brockton Neighborhood Health Center: An Institution Formed and Molded by Controversy. Jennifer Collins

²⁸ Ibid.

²⁹ EPA EJSCREEN

³⁰ Cancer Incidence in Massachusetts 2009-2013 for Brockton

³¹ Massachusetts Communities with Highest Asthma Prevalence. Mass. Dept. of Public Health. 2017

³² 500 Cities Project: Local Data for Better Health 2014. Brockton, MA

³³ Community Health Needs Assessment for the Greater Brockton CHNA. Dec 2010.

³⁴ 500 Cities project: Local Data for Better Health 2014. Brockton, MA

³⁵ EPA EJSCREEN

³⁶ DATA USA: Brockton

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underinsured population **exceeding 70% minority**³⁷, exemplifying EJ concerns-*Community engagement, including translators, to address affordable housing, new jobs and health issues will incorporate EJ concerns.* Despite recent expansion in permanent, supportive housing for the homeless, the demand exceeds availability and the target area shelters are overwhelmed-The former “Tent City” homeless encampment at the CSX railyard in the target area was dismantled in 2016. *Increased revenue is anticipated to increase homeless and veterans housing and funding for support services.* The highest rate of homicide in the state³⁸, *will be reduced by redeveloping blighted properties and increasing visibility and safety improvements.*

2.b. Community Engagement (8 points)

2.b.i. Community Involvement (5 points)

The City will foster community engagement and integrate revitalization plans with our Partners:

NeighborWorks Southern Massachusetts: Normand Grenier, (617) 770-2227; ngrenier@nwsoma.org ; <i>Affordable housing; home financing; education and outreach support</i>
Brockton Area Workforce Investment Board: Jason Hunter, (508) 584-3234; jhunter@bawib.org ; <i>Opportunities for workforce development in the target area</i>
MassDevelopment: Maryellen DeFrias; (508) 678-0533; MDeFrias@Massdevelopment.com <i>Brownfields Assessment/Cleanup funding; Developer financing; Tax credits; Developer RFPs</i>
Brockton Housing Authority: Tom Thibeault; (508) 588-6880; tomt@brocktonhousingauthority.com ; <i>Address affordable housing needs and provide translators</i>
Brockton 21st Century Corp: Daniel Evans, Jr., President; (508) 586-0021 <i>Outreach to existing and new businesses in the target area</i>
Downtown Brockton Association: John Marian; (508) 612-2688; jjmerian@yahoo.com <i>Connect to members including target area churches, city agencies, and stakeholders</i>
Concord Square Planning & Development, Inc.: Ted Carman (617-719-5573); Carman@ConcordSqDev.com <i>Planning, development, and zoning support</i>
Brockton Coalition for the Homeless: John Yazwinski (508) 427-6448, x. 2110 jyazinski@helpfbms.org <i>Voice for the homeless and link to support and affordable housing</i>
Brockton Neighborhood Health Center: Sue Joss, CEO; (508) 559-6699; josss@bnhc.org <i>Support on community health needs and outreach, including translation services.</i>
Brockton Area Transit Authority; Ray Ledoux; (508) 588-2240; rldeoux@ridebat.com <i>Transportation and Transit/ TOD support</i>

2.b.ii. Incorporating Community Input (3 points): We will build on recent successes conducted in the City, such as the Comprehensive Master Plan and A Blueprint for Brockton benefiting from extensive community engagement and information program including “listening sessions” in neighborhoods, on-line surveys, workshops, steering committees, websites and social media. These plans emerged from an ongoing collaborative process involving hundreds of citizens and other stakeholders throughout the community. We will utilize these same tools, including translators, City and Project and community partner websites, and conduct quarterly meetings to keep the community informed. We will also develop and distribute multilingual brochures, prepare charrettes, and exhibit posters (both printed and electronic) to educate the public. We will invite local newspapers, radio and television stations to cover meetings. We will host informational booths at community, governmental and cultural events in the target area.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks and Activities (15 Points)

³⁷ Census Tracts 410900, 51400, 51500 in Downtown. U.S Census Tract data for 2010.

³⁸ 2017 Massachusetts State Health Assessment (Brockton). Mass. Dept. of Public Health

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Project Implementation (10 points)

Task 1: Cooperative Agreement Oversight: We will establish a Brownfields Steering Committee and MassDEP and EPA Brownfields staff will be invited. The Assessor will update the target area inventory of sites and tax-delinquent properties. We will issue a Request for Proposals (RFP) to select a Qualified Environmental Professional (QEP) and prepare required EPA reporting (quarterly reports, ACRES, etc.) and perform general program management. The Committee will initially meet monthly and then quarterly to execute the priorities and direction of the Brownfields Program. Meetings will be open to the public and held in the target area.

Task 2: Community Outreach & Engagement: We will use outreach tools and neighborhood walks, surveys, face-to-face communications, to solicit and generate input. Public meetings will be held to engage the community about the Brownfields process and translators will be utilized to support our multilingual population in the target area. We will prepare site access agreements.

Task 3: Phase I and Phase II Site Assessments: Our QEP will conduct Phase I Environmental Site Assessments (**P1 ESAs**) for each selected eligible site in accordance with the ASTM E 1527-13 Standard. *To maximize funding dollars and consolidate our effort, site reconnaissance, interviews, database reviews and file reviews will be performed simultaneously for multiple properties.* P1 ESA reports will include a summary of “recognized environmental conditions” (RECs), and recommended Phase II ESA (**P2ESA**) activities. **P2ESAs** will include media sampling, lab analysis, and risk assessments. Staff hours include report reviews; interface with community, stakeholders, regulators and property owners.

Task 4: Cleanup and Area-Wide Reuse Planning: Cleanup Plans with integrated Analysis of Brownfield Cleanup Alternatives (ABCAs) will address remedial actions for sites exceeding state (MCP³⁹) regulatory criteria. Cleanup Plans will include a feasibility analysis, protective of human health and the environment. Reuse planning will include community design charrettes, site reuse goals, and discussions with the development teams and Brownfields committee to address site reuse directly related to Brownfields. Quarterly public meetings will discuss the results of the assessments and proposed remediation and reuse planning to solicit public input.

Schedule of Activities in 3-Year Period		Year 1				Year 2				Year 3			
		1	2	3	4	5	6	7	8	9	10	11	12
1	Establish BF Committee	•											
	Issue RFP/Select QEP	•											
	EPA reporting	•	•	•	•	•	•	•	•	•	•	•	•
	BF Committee meetings	•	•	•	•	•	•	•	•	•	•	•	•
2	Access agreements	•	•			•			•				
	Public meetings	•	•	•	•	•	•	•	•	•	•	•	•
3	Hazardous Substances P1 ESAs (8)		•	•	•	•	•	•	•	•			
	Hazardous Substances P2 ESAs (5)			•		•		•	•		•		
	Petroleum P1 ESAs (5)		•		•		•		•	•			
	Petroleum P2 ESAs (3)			•			•				•		
4	Hazardous Substances ABCAs (4)					•		•		•		•	
	Petroleum ABCAs (2)						•					•	
	Planning and Reuse Documents						•		•		•		•

³⁹ The Massachusetts Contingency Plan is the state’s environmental regulation that provides for the protection of health, safety, public welfare and the environment by establishing requirements and procedures for the activities and cleanup of oil or hazardous materials.

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Task/Activity Lead (5 points)

The City's Planning & Economic Dept. (**PED**) will serve as the Lead for *Task 1-Cooperative Agreement Oversight*, with support from the Brownfields Committee, QEP, Assessors Dept., and legal counsel. PED and the Mayor's Office will lead *Task 2-Community Engagement*, with support from our Project partners, Health Dept. and QEP, including the use of translators. For *Task 3-Phase 1 and Phase 2 Site Assessments*, PED will direct our QEP, which will include an LSP⁴⁰, for execution of Task 3, report preparation, and interpretation of federal and state regulatory requirements and interfacing with regulatory authorities. PED and the Mayor's Office will provide direction to City staff for implementation support. PED will lead *Task 4-Cleanup and Reuse Planning*. We will obtain direction from our QEP on cleanup approaches and strategies. We will obtain support from our planning partners and economic development team for reuse. We will rely on our development Project partners to provide support on redevelopment support. PED will continue to provide "matchmaker" interface between the property owners and developers during Task 4 activities and PED will apply its planning expertise for reuse planning of the target area.

3.b. Cost Estimates and Outputs (15 Points)

Cost Estimates (10 points)

Budget Categories	Project Tasks-HAZARDOUS MATERIALS ASSESSMENTS				
	Task 1 Coop. Agreement Oversight	Task 2 Community Engagement	Task 3 Phase 1 & Phase 2 Site Assessments	Task 4 Cleanup and Reuse Planning	Total
Personnel	\$4,000	\$4,000	\$ 4,000	\$8,000	\$20,000
Fringe Benefits ⁴¹					
Travel	\$2,000				\$2,000
Equipment					
Supplies					
Contractual	\$3,200	\$3,200	\$157,700	\$13,900	\$178,000
Other					
Total	\$9,200	\$7,200	\$167,000	\$21,900	\$200,000
Budget Categories	Project Tasks-PETROLEUM ASSESSMENTS				
	Task 1 Coop. Agreement Oversight	Task 2 Community Engagement	Task 3 Phase I & Phase II Assessments	Task 4 Cleanup and Reuse Planning	Total
Personnel	\$1,000	\$2,000	\$2,000	\$5,000	\$10,000
Fringe Benefits*					
Travel					
Equipment					
Supplies					

⁴⁰ In 1993, Massachusetts created a model program that privatized the cleanup of hazardous waste sites in the Commonwealth. Licensed Site Professionals (LSPs) are authorized by the Commonwealth to work on behalf of property owners, operators, and other responsible parties to oversee the assessment and cleanup of contamination that has been released into the environment and governed by the Massachusetts Board of Registration of Hazardous Waste Site Cleanup Professionals, also known as the LSP Board.

⁴¹ Fringe Benefits are included in Personnel costs line item

Downtown Target Area

Contractual	\$800	\$800	\$83,600	\$4,800	\$90,000
Other					
Total	\$1,800	\$2,800	\$85,600	\$9,800	\$100,000

Task 1 Budget: Hazardous substances (*HS*): 80 staff hours (\$50/hr.) and \$3,200 QEP support; Petroleum (*PETRO*): 20 staff hours (\$50/hr.) and \$800 QEP support. Travel is for one EPA Brownfields conference (i.e., est. \$2K conference for airfare, hotel, per diem, and expenses).

Task 2 Budget: *HS Budget:* 80 staff hours (\$50/hr.) and \$3,200 QEP support;

PETRO Budget: 40 staff hours (\$50/hr.) and \$800 QEP support;

Task 3 Budget: *HS Budget:* 80 staff hours (\$50/hr.) and \$3,200 QEP support. 8 **P1 ESAs** (\$4,000 ea.); 5 **P2 ESAs** (\$24,500 ea.); *PETRO Budget:* 40 staff hours (\$50/hr.) and \$800 QEP support. 5 **P1 ESAs** (\$4,000 ea.); 3 **P2 ESAs** (\$22,600 ea.);

Task 4 Budget: *HS Budget:* 160 staff hours (\$50/hr.) & \$1,600 QEP support. 4 ABCAs (\$3,475 ea.); *PETRO Budget:* 100 staff hours (\$50/hr.) & \$800 QEP support. 2 ABCAs (\$2,000 ea.).

Outputs (5 points)

Outputs to be completed within the 3-year period of performance include a strong public outreach program that fosters collaboration and measures success; Project schedules and milestones for activities from pre-assessment through cleanup and reuse planning. Meetings, presentations, and materials, including multilingual documents, posters, flyers; Documents and reports, including: Site inventories; QAPPAs for eligible sites; Site access agreements; Quarterly ACRES, P1 ESA and P2 ESA reports. P2 ESA data to assess potential risk to human health and/or the environment and determining if a state reporting threshold is triggered, and to support cleanup estimates and funding applications; ABCAs and Cleanup plans for site remediation and reuse plans. Estimated costs for cleanup, incorporating proposed redevelopment scenarios; Cleanup plans to be incorporated into design and construction plans for redeveloped sites; Planning and reuse documents and presentations, including conceptual redevelopment design charrettes.

3.c. Measuring Environmental Results (5 Points)

Our anticipated outputs from the Brownfields Program include technical and quantitative reports to provide the City with the next steps to move the sites forward. We will prepare quarterly reports and update ACRES to document site progress. Outcomes include developer purchase of privately-owned sites for cleanup and redevelopment. We will measure the qualitative and quantitative outcomes of community engagement. We will incorporate schedule flexibility to adapt to potential changes (i.e., staff, weather, property ownership, developer). We will measure project outcomes beyond the completion of the Brownfields Assessment program by increases in tax revenue, number of jobs created, decrease in crime, number of acres remediated/redeveloped, number of acres of greenspace created, kilowatt hours of renewable energy produced, miles of infrastructure upgraded, percent reduction in health issues, number of units of affordable housing, increase in transit (bus/rail) usage. Additional anticipated outcomes include decrease in homelessness, increase in awareness of EJ issues and decrease in EJ impacts, increase in public participation, increase in recreation (including pedestrians). We expect that some of the sites will trigger MassDEP reporting criteria outcomes and we will work with the Potential Responsible Parties (PRPs) to facilitate registration in the state voluntary cleanup program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (15 points)**4.a. Programmatic Capability (9 points)****4.a.i. Organizational Structure (5 points)**

Downtown Target Area

This grant will be managed by the Dept. of Planning and Economic Development. The Director, Rob May, has significant experience managing state and federal grants. Mr. May has over 25 years of public and non-profit management experience including previous Brownfields work. Mr. May and his staff collaborate with various stakeholders and City departments to achieve the grant's goals and objectives. The Department's financial management staff will ensure all invoices are paid within 30 days, and that all back-up documentation is on file to support expenditures of state and federal funds. Expenditures routinely monitored, reviewed and approved annually by the City's auditor. Mr. May will be assisted by Shane O'Brian, Staff Planner, who will provide mapping support and facilitate community engagement and Pamela Gurley, administrative assistant, who will provide financial management of the grant and contractors. Mr. O'Brian has over five years of planning experience, while Ms. Gurley has over 28 years of grant and financial systems management experience. In the event of staff turnover or the loss of the agency, the Mayor's Office would become responsible for ongoing compliance/completion for the duration of the Grant period.

4.a.ii. Acquiring Additional Resources (4 points)

We will seek support from municipal staff, city, state and federal agencies, and the private sector to support our Brownfields program. We will seek support from NJIT⁴² for stakeholder workshops and charrettes. Old Colony Planning Council (OCPC) in Brockton can provide transportation planning support. City Fire, Police, and Health Dept. will provide safety, security and health support to assess Brownfields sites (i.e., potential discarded hypodermic needles, squatters, gang territory) and Dept. of Public Works and Engineer to address infrastructure needs. We will work with the state Attorney General to seek Covenants Not to Sue. Additional state agency support includes DHCD⁴³, Mass. Dept. of Veterans Services, DPH, State Police, Dept. of Transportation and federal agencies include HUD and Veterans Affairs Dept.

4.b. Past Performance and Accomplishments (6 points)

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)

(1) Accomplishments (3 points): The City has received 4 EPA Brownfields Assessment Grants, 1 Cleanup Grant and 1 Revolving Loan Fund (RLF), totaling \$950K, from 1998 to 2007. Nine Phase I ESAs and five Phase II ESAs were completed from 2011-2012. The former Corcoran Building was assessed and slated to be sold and redeveloped into 50 residences and commercial space. The FY'04 Cleanup Grant addressed remediation of the former Montello Auto body site, which is under development. A former manufactured gas plant was remediated in 2004 and redeveloped as the 3.7-acre Brockton Brightfield solar power plant. The former Ralsco Kitchen Manufacturing site was assessed, remediated and redeveloped as Charlie Tartaglia Park in 2017, providing year-round recreation of the underserved children. The former Montello Shoe Last Company was developed into 22 affordable and market-rate townhouses.

(2) Compliance with Grant Requirements (3 points): The City complied with quarterly ACRES reporting requirements, including financial and progress reports. The City has never had any adverse audits and are in full compliance with all compliance reporting, documentation and expenditure of funds management. It is noted that some of the EPA grant monies were not expended within the allotted timeline by a prior Project Manager. Since the hiring of Mr. May, the City has established an improved management and program tracking to ensure that grants are expended within the grant period. There a new qualified management team in place to ensure future grant compliance and expenditures.

⁴² New Jersey Institute of Technology provides Technical Assistance for Brownfields Communities Program for EPA Region 1

⁴³ Massachusetts Department of Housing and Community Development

THRESHOLD CRITERIA FOR ASSESSMENT GRANTS

1. Applicant Eligibility

The City of Brockton, Massachusetts is eligible to apply for an EPA Brownfields Assessment grant because it is a General Purpose Unit of Government.

2. Community Involvement

We will build on recent successes conducted in the City, such as the Comprehensive Master Plan and A Blueprint for Brockton benefiting from extensive community engagement and information program including “listening sessions” in neighborhoods, on-line surveys, workshops, steering committees, websites and social media. These plans emerged from an ongoing collaborative process involving hundreds of citizens and other stakeholders throughout the community. We will utilize these same tools, including translators, City and community partner websites, and conduct quarterly meetings to keep the community informed. We will also develop and distribute multilingual brochures, prepare charrettes, and exhibit posters (both printed and electronic) to educate the public. We will invite local newspapers, radio and television stations to cover meetings. We will host informational booths at community, governmental and cultural events in the target area.

3. Expenditure of Assessment Grant Funds

Not Applicable

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/29/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Brockton

* b. Employer/Taxpayer Identification Number (EIN/TIN):

046001382

* c. Organizational DUNS:

9491071550000

d. Address:

* Street1:

45 School Street

Street2:

* City:

Brockton

County/Parish:

* State:

MA: Massachusetts

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

02301-4049

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr .

* First Name:

Rob

Middle Name:

* Last Name:

May

Suffix:

Title: Director of Planning and Economic Development

Organizational Affiliation:

* Telephone Number:

508-580-7113

Fax Number:

* Email:

rmay@cobma.us

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Downtown Brockton Brownfields Assessment Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

8th

* b. Program/Project

MA-008

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

05/01/2019

* b. End Date:

11/01/2019

18. Estimated Funding (\$):

* a. Federal

300,000.00

* b. Applicant

0.00

* c. State

0.00

* d. Local

0.00

* e. Other

0.00

* f. Program Income

0.00

* g. TOTAL

300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Bill

Middle Name:

* Last Name:

Carpenter

Suffix:

* Title:

Mayor

* Telephone Number:

508-580-7123

Fax Number:

* Email:

billcarpenter@cobma.us

* Signature of Authorized Representative:

Paul Umano

* Date Signed:

01/29/2019